

FILED

OCT 06 2020

Mark C. McCartt, Clerk
U.S. DISTRICT COURT

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OKLAHOMA**

UNITED STATES OF AMERICA,)	Case No. <u>20 CR219 CVE</u>
)	
Plaintiff,)	<u>INDICTMENT</u>
)	[COUNTS 1 and 2: 18 U.S.C. §§ 1151,
v.)	1152, 2261A(1)(A)(i), 2261A(1)(A)(ii),
)	2261A(1)(B), and 2261(b)(5) –
ZACHARY THOMAS PRICE,)	Stalking in Indian Country]
)	
Defendant.)	

THE GRAND JURY CHARGES:

COUNT ONE

**[18 U.S.C. §§ 1151, 1152, 2261A(1)(A)(i),
2261A(1)(A)(ii), 2261A(1)(B), and 2261(b)(5)]**

From on or about April 1, 2020, to on or about August 23, 2020, within Indian Country in the Northern District of Oklahoma, the defendant, **ZACHARY THOMAS PRICE**, a non-Indian, with the intent to kill, injure, harass and intimidate another person known to the Grand Jury and designated herein as M.H., an Indian male, engaged in conduct that:

1. placed M.H. and S.H., an immediate family member, in reasonable fear of death and serious bodily injury to M.H. and S.H.; and
2. caused, attempted to cause, and would be reasonably expected to cause substantial emotional distress to M.H. and S.H.

All in violation of Title 18, United States Code, Sections 1151, 1152, 2261A(1)(A)(i), 2261A(1)(A)(ii), 2261A(1)(B), and 2261(b)(5).

COUNT TWO

**[18 U.S.C. §§ 1151, 1152, 2261A(1)(A)(i),
2261A(1)(A)(ii), 2261A(1)(B), and 2261(b)(5)]**

From on or about April 1, 2020, to on or about August 23, 2020, within Indian Country in the Northern District of Oklahoma, the defendant, **ZACHARY THOMAS PRICE**, a non-Indian, with the intent to kill, injure, harass and intimidate another person known to the Grand Jury and designated herein as E.B., an Indian male, engaged in conduct that:

1. placed E.B. and L.B., an immediate family member, in reasonable fear of death and serious bodily injury to E.B. and L.B.; and
2. caused, attempted to cause, and would be reasonably expected to cause substantial emotional distress to E.B. and L.B.

All in violation of Title 18, United States Code, Sections 1151, 1152, 2261A(1)(A)(i), 2261A(1)(A)(ii), 2261A(1)(B), and 2261(b)(5).

R. TRENT SHORES
UNITED STATES ATTORNEY

A TRUE BILL



D. EDWARD SNOW
Assistant United States Attorney

/s/ Grand Jury Foreperson

Grand Jury Foreperson